

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re

**Meridian Redevelopment Inc.,**

Debtor

Case No. 22-60232-tmr7

☐ Amended

**NOTICE OF INTENT TO SELL REAL OR  
PERSONAL PROPERTY, COMPENSATE  
REAL ESTATE BROKER, AND/OR PAY  
ANY SECURED CREDITOR'S FEES AND  
COSTS; MOTION FOR AUTHORITY TO  
SELL PROPERTY FREE AND CLEAR OF  
LIENS; AND NOTICE OF HEARING**

[Do not use to sell personally identifiable  
information about individuals]

**NOTICE IS GIVEN** that Kenneth S. Eiler, the Chapter 7 Trustee  
(debtor, trustee, etc.), intends to sell the property described below and moves for authority  
to sell the property free and clear of liens under 11 U.S.C. § 363(f) and the guidelines set  
forth in Local Bankruptcy Form (LBF) 363, *Procedures re: Motions for Sale of All or*  
*Substantially All Assets*. The movant's name, address, and phone number are:

Kenneth S. Eiler, Trustee, 515 NW Saltzman Rd., PMB 810, Portland, OR 97229  
503-292-6020

If you wish to object to any aspect of the sale or fees disclosed in paragraph 7 or 15, you  
must:

1. Attend the hearing set in paragraph 16 below; and
2. Within 21 days after the later of the date next to the signature below or the service  
date in paragraph 17 below, file with the clerk at 1050 SW 6th Ave. #700, Portland OR  
97204 or 405 E 8th Ave. #2600, Eugene OR 97401:
  - a. a written objection stating the specific facts upon which the objection is based, and
  - b. a certificate of service of the objection on the movant.

This document constitutes the notice required by Local Bankruptcy Rule (LBR) 2002-1.  
All sections must be completed.

1. The specific subsections of 11 U.S.C. § 363(f) movant relies on for authority to sell the  
property free and clear of liens are:  
363(f)(1) because ORS 37.250(2) provides for sales free and clear of liens; and 363(f)  
(2) because Veristone has agreed to the sale with a \$74,642.55 carve-out of sale  
proceeds to which it would otherwise be entitled.

2. Buyer's name & relation to debtor:

**Valerie Kingsland. Unrelated to debtor**

3. General description of the property (if real property, state street address here. Also attach legal description as an exhibit to the notice filed with the court):

**Real property located at 93541 and 93545 Territorial Hwy, Junction City, OR 97448**

4. A copy of the full property description or inventory may be examined or obtained at:

**Contact Trustee's Agent Bradley King at 503-313-8262 or at [bradleyking@kw.com](mailto:bradleyking@kw.com)**

5. The property may be previewed at (include time and place):

**Contact Trustee's Agent Bradley King at 503-313-8262 or at [bradleyking@kw.com](mailto:bradleyking@kw.com)**

6. Other parties to the transaction and their relationship to the debtor are:

**N/A**

7. The gross sale price is: \$ **390,000.00**.

All liens on the property total \$ **456,895.01**, of which movant believes a total of \$ **74,642.55** need not be paid as secured claims (because the lien is invalid, avoidable, etc., the lienholder consents to less than full payment, or part or all of the underlying debt is not allowable).

Secured creditor(s) also seek(s) reimbursement of \$ **0.00** for fees and costs.

Total sales costs will be: \$ **\$24,500.00**.

All tax consequences have been considered, and it presently appears that the sale will result in net proceeds to the estate after payment of valid liens, fees, costs, and taxes of approximately: \$ **50,142.55**.

8. The sale ☐ is ☒ is not (mark one) of substantially all of the debtor's assets. Terms and conditions of sale:

**Sale is subject to buyer obtaining financing and inspection of property at such time property is surrendered to the Trustee pursuant to the pending Motion for Turn Over of Property (ECF No. 165).**

9. Competing bids must be submitted to the movant no later than 02/02/2023 and must exceed the above offer by at least \$10,000.00 and be on the same or more favorable terms to the estate.

10. Summary of all available information regarding valuation, including any independent appraisals:

**2022 Lane County Tax Assessor Appraisal - \$406,147.00**

11. If paragraph 7 indicates little or no equity for the estate, the reason for the sale is:

**N/A**

and expenses and taxes resulting from the sale will be paid as follows:

**Broker Fee \$19,500.00**

**Closing Costs approximately \$5,000**

12. (Chapter 11 cases only) The reason for proposing the sale before confirmation of a plan of reorganization is:

**N/A**

13. The following information relates to lienholders (who are listed in priority order):

Name	Service Address [See Federal Rule of Bankruptcy Procedure (FRBP) 7004]	Approx. Lien Amount	Indicate Treatment at Closing (Fully Paid, Partially Paid, or Not Paid.)
<b>Veristone Mortgage, LLC</b>	<b>Veristone Companies, LLC 6725 116th Ave NE, Ste 210 Kirkland, WA 98033-8445</b>	<b>\$400,537.56</b>	<b>Partially Paid</b>
<b>Lane County Tax Assessor</b>	<b>Mary Vuksich-Shafer 125 East 8th Avenue Eugene, OR 97401</b>	<b>\$6,357.45</b>	<b>Fully Paid</b>
<b>Robert Stricklan</b>	<b>Robert William Stricklan 4505 S. Alta Drive Lincoln City, OR 97367</b>	<b>\$50,000.00</b>	<b>Not Paid</b>

14. Any liens not fully paid at closing will attach to the sale proceeds in the same order of priority they attach to the property. Any proceeds remaining after paying liens, expenses, taxes, commissions, fees, costs, or other charges as provided in this motion, must be held in trust until the court orders payment.

15. (If real property) The court appointed real estate broker, Bradley King  
will be paid \$19,500.00.

16. A hearing on the motion and any objections to the sale or fees, at which witnesses may not testify, is scheduled as follows:

Date: 02/09/2023 Time: 10:00 a.m.

Location: ☐ Courtroom # \_\_\_\_\_, \_\_\_\_\_

☒ Telephone Hearing [See LBF 888, *Telephone Hearing Requirements*.]

Call In Number: (888) 684-8852

Access Code: ☐ 5870400 for Judge David W. Hercher (dwh)  
☐ 1238244 for Judge Peter C. McKittrick (pcm)  
☐ 4950985 for Judge Teresa H. Pearson (thp)  
☒ 3388495 for Judge Thomas M. Renn (tmr)

☐ Video Hearing. To connect, see [www.orb.uscourts.gov/video-hearings](http://www.orb.uscourts.gov/video-hearings).

If no timely objection is filed, the hearing may be canceled and an order submitted. Parties are encouraged to check the hearing calendar at <https://www.orb.uscourts.gov> after the objection deadline has passed.

17. I certify that on 01/06/2023 this document was served, under FRBP 7004, on the debtor(s), trustee (if any), U.S. Trustee, each named lienholder at the address listed above, the creditors' committee chairperson (if any), and their attorneys; and (unless movant is a chapter 7 trustee) that it was also sent on that date, pursuant to FRBP 2002(a), to all creditors and all parties as listed in the court's records that were obtained on \_\_\_\_\_, a copy of which is attached to the document filed with the court.

18. For further information, contact:

David Criswell, 503-778-2198, [CriswellD@lanepowell.com](mailto:CriswellD@lanepowell.com)  
Kenneth S. Eiler, 503-292-6020, [kenneth.eiler7@gmail.com](mailto:kenneth.eiler7@gmail.com)

01/06/2023 /s/ David W. Criswell, Attorney for Trustee  
Date Signature & Relation to Movant

\_\_\_\_\_  
(If debtor is movant) Debtor's Address & Last 4 Digits of Taxpayer ID#